

Kobzon, S.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re OPTIONAL SECURITIES ) NO: 07-CV-3753 (LAK)  
LITIGATION )  
HON. LEWIS A. KAPLAN

NO: 07-CV-3753 (LAK)

HON. LEWIS A. KAPLAN

**STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR  
FILING AMENDED CONSOLIDATED COMPLAINT  
AND BRIEFING MOTION(S) TO DISMISS**

It is hereby STIPULATED AND AGREED by and between the undersigned counsel for the parties as follows:

1. Lead Plaintiff, KLD Investment Management, Inc. ("Plaintiff") shall, no later than 30 days following the execution of this stipulation, file an Amended Consolidated Complaint (the "Complaint"), which Complaint will supersede all complaints filed in this action, including but not limited to the complaint filed in *Bock v. Optionable Inc., et al.* (Civ. A. 07-5948), which shall be consolidated with this action or dismissed.

2. Defendants Optionable, Inc., Mark Nordlicht, Kevin Cassidy, Edward J. O'Connor, Albert Helmig, and Marc-Andre Boisseau ("Defendants"), shall, no later than 30 days following service of the Complaint, file any motions to dismiss the Complaint, or otherwise respond to the Complaint.

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DOC #: 12/21/07  
DATE FILED: 12/21/07

3. Lead Plaintiff shall, no later than 30 days after service of each motion to dismiss, serve and file its opposition.

4. Defendants shall, no later than 30 days following service of the opposition to any motions to dismiss, serve and file any reply briefs.

Dated: December 18, 2007

Respectfully submitted,

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IT IS SO ORDERED.

December 21, 2007

*L.A.K.*  
Honorable Lewis A. Kaplan